

Troutman Pepper Locke LLP
Bank of America Plaza, 600 Peachtree Street NE, Suite 3000
Atlanta, GA 30308



troutman.com

Mary Weeks
D 404.885.3634
mary.weeks@troutman.com

April 24, 2025

Honorable Jennifer L. Rochon
United States District Judge
United States District Court for the Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Jaar v. Northern Genesis Acquisition Corp. et. al.*
No. 24-cv-02155 (JLR)

Dear Judge Rochon:

In accordance with Your Honor's Order on January 24, 2025 (ECF 56), Defendants Northern Genesis Acquisition Corp. ("NGA") and the Lion Electric Company ("Lion", and together with NGA, the "Defendants") write to update the Court on the status regarding the bankruptcy proceedings.

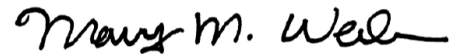
On December 17, 2024, Lion and its subsidiaries commenced before the Superior Court of Quebec (Commercial Division) a proceeding pursuant to the *Companies' Creditors Arrangement Act*, R.S.C. 1985, c. C-36 (the "Canadian Proceeding"). On December 18, 2024, Lion, in its capacity as the duly-appointed foreign representative for itself, NGA, and each of the Debtors¹ that are the subject of the Canadian Proceeding, filed voluntary petitions for itself and each of the Debtors under chapter 15 of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.*, in the United States Bankruptcy Court for the Northern District of Illinois seeking recognition of the Canadian Proceeding in the United States. In connection with these proceedings, the Debtors have begun a sale and restructuring process supervised by the Superior Court of Quebec (Commercial Division). That process remains ongoing.

¹ The Debtors, together with the last four digits of their business number or employment identification number, as applicable, are: The Lion Electric Company (6310); Lion Electric Finance Canada Inc. (8102); Lion Electric Vehicles Finance Canada Inc. (7415); Lion Electric Holding USA Inc. (0699); Northern Genesis Acquisition Corp. (7939); The Lion Electric Co. USA Inc. (9919); Lion Electric Manufacturing USA, Inc. (0766); and Lion Electric Finance USA, Inc. (4755).

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Defendants will provide a further status update to the Court in 90 days, or July 23, 2025, as contemplated in the Court's January 24, 2025 Order (ECF 56). Should Your Honor have any questions, we can be available at the Court's convenience.

Respectfully submitted,



Mary M. Weeks

cc: All Counsel of Record (via ECF)